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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT AGREED MOTION FOR LEAVE
TO FILE CLASS CERTIFICATION
BRIEFS IN EXCESS OF PAGE LIMITS
IMPOSED BY LOCAL RULE II 7-3**

Pursuant to Local Rule II 7-3(c), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury ("Plaintiffs") and Defendant Zuffa, LLC
("Zuffa") (Zuffa and Plaintiffs collectively, "the Parties"), by and through their undersigned
attorneys, move for leave to file class certification briefing in excess of the page limits imposed
by Local Rule II 7-3. This Motion is based upon the pleadings and papers on file herein, the

Memorandum of Points and Authorities below, and all papers and exhibits on file in this case.

MEMORANDUM OF POINTS AND AUTHORITIES

Local Rule II 7-3(b) provides that class certification motions and opposition briefs are limited to 24 pages, excluding exhibits, and that class certification replies are limited to 12 pages, excluding exhibits. The Court retains the authority to modify or relax such rule. *Veterinary Ventures, Inc. v. Farris*, 2010 WL 3070423, at *2 (D. Nev. Aug. 3, 2010) (citing *Gennock v. Warner-Lambert Co.*, 208 F. Supp. 2d 1156, 1158 (D. Nev. 2002)). L.R. II 7-3(c) empowers the Court to permit a party to file a motion or brief in excess of the page limitations set forth in L.R. II 7-3(b). “Given the district court’s inherent power to control their dockets, whether to grant leave to exceed the page limits set forth in the Civil Local Rules appears to be at the full discretion of the Court.” *FTC v. AMG Servs, Inc.*, 2016 WL 1275612, at *2, n.2 (D. Nev. Mar. 31, 2016) (quoting *Traylor Bros. v. San Diego Unified Port Dist.*, 2012 WL 1019966, at *2 (S.D. Cal. Mar. 26, 2012)).

District courts in Nevada will permit a party to file a motion or brief in excess of the page limits imposed by the Local Rules, where the party has properly filed a motion for leave of court and good cause exists for the extension. *See Robins v. Baker*, 2013 WL 5947343, at *6 (D. Nev. Nov. 5, 2013); *see, e.g., Homick v. Baker*, 2013 WL 5408643, at *1 (D. Nev. Sept. 25, 2013); *Vanisi v. Baker*, 2012 WL 1431373, at *1 (D. Nev. Apr. 25, 2012); *Grimsley v. Charles River Labs.*, 2011 WL 4527415, at *1 (D. Nev. Sept. 28, 2011). Good cause for exceeding the page limits may exist where the record is voluminous, the relevant issues are “substantial” and “susceptible of lengthy exposition.” *Jacobs v. Clark Cnty. School Dist.*, 375 F. Supp. 2d 1162, 1168 (D. Nev. 2005) (granting motion to exceed page limit where the relevant issues were “substantial” and “susceptible of lengthy exposition”).

The Parties, having met and conferred on this issue and agreed to the proposed page limits set forth below, seek leave from the Court to exceed the page limits set by Local Rule II 7-3(b) as follows:

Brief	Current Limit	Agreed Increase	Proposed Limit
Plaintiffs' Motion for Class Certification	24 pages	11 pages	35 pages
Zuffa's Opposition to Motion for Class Certification	24 pages	16 pages	40 pages
Plaintiffs' Reply in Support of Class Certification	12 pages	13 pages	25 pages

These agreed page limits maintain the same 3:2 page limit ratio provided for in the Local Rules.

The extra pages are necessary because of the voluminous record in the case and the intricate issues involved in this antitrust case at the class certification stage. To date, there are over 500 docket entries in this case. The operative complaint contains nearly 60 pages of allegations. Plaintiffs' Opening Expert Reports contain approximately 550 pages of expert opinion, and the Parties are exchanging two additional rounds of expert reports in the coming months. The Parties respectfully submit that permitting class certification briefs in excess of the page limit will assist the Court in ruling on the upcoming motion for class certification.

The Parties respectfully request an order granting the parties leave to file class certification briefs in excess of the page limits imposed by L.R. II 7-3, in order to ensure that all material issues can be adequately addressed.

DATED: November 13, 2017

/s/ Patrick F. Madden

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